SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

April 11, 2002

BY ELECTRONIC COMMENT FILING SYSTEM

William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

> **Re:** **Report of PrimeCo Spectrum Holdings LLC on Implementation of TTY Digital Compatibility for 911 Emergency Calling for Station WPQL237**
> **CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of PrimeCo Spectrum Holdings LLC ("PrimeCo Spectrum"), pursuant to CC Docket No. 94-102, Fourth Report and Order, we hereby submit its report on implementation of TTY digital compatibility for 911 emergency calling for Station WPQL237.

Development Activities

(1) Network infrastructure software development

PrimeCo Spectrum currently uses Lucent Technologies ("Lucent") as the infrastructure provider for PrimeCo Spectrum's CDMA system. PrimeCo Spectrum's system has the latest wireless switch software release that is generally available (ECP 17.0, 5ESS 15.0). Lucent has developed the software feature required for TTY digital compatibility.

(2) Handset development and testing plans

Nokia is the only manufacturer contacted by PrimeCo that provides handsets with TTY digital compatibility – the Nokia 3285. PrimeCo Spectrum has successfully tested the Nokia 3285 handset.

(3) Beta testing and lab testing

The manufacturers are responsible for beta testing and lab testing.

(4) Release and general availability to carriers of network infrastructure software

Lucent now provides the software feature required for TTY digital compatibility.

(5) Availability to carriers of full acceptance test units

PrimeCo Spectrum has successfully tested its system for TTY digital compatibility.

(6) Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices

PrimeCo Spectrum has installed the Lucent software feature for TTY digital compatibility and has upgraded all network hardware to handle the implementation of the software feature.

Testing and Deployment Activities

(7) Carrier coordination of testing with PSAP

PrimeCo Spectrum is in the process of testing with a PSAP capable of handling TTY calls.

(8) Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests

PrimeCo Spectrum has successfully tested its network for TTY digital compatibility. It will complete final testing with a PSAP capable of handling TTY calls on April 10, 2002.

(9) Retail availability of necessary consumer equipment

The Nokia 3285 handset will be ordered for customers who request a TTY digital compatible handset.

(10) Geographic scope of network infrastructure deployment

PrimeCo Spectrum has deployed TTY digital compatibility throughout all parts of the Chicago, IL MTA (excluding the partitioned Wisconsin portion) where PrimeCo Spectrum is capable of providing service to customers.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Eliot J. Greenwald

Cc: Qualex International (by e-mail)
       Pam Gregory (by e-mail)
       Mindy Littell (by e-mail)
       Kris A. Monteith (by e-mail)